

1 JEFFREY N. LABOVITCH (NBN: 10915)  
2 jlabovitch@nicolaidesllp.com  
3 NICOLAIDES FINK THORPE  
MICHAELIDES SULLIVAN LLP  
4 4365 Executive Drive, Suite 950  
San Diego, CA 92121  
Telephone: (858) 257-0700  
Facsimile: (858) 257-0701  
5

6 KEVIN E. HELM (NBN: 3432)  
KevinH@helmandassociates.net  
7 HELM & ASSOCIATES  
2330 Paseo Del Prado, Suite C103  
8 Las Vegas, NV 89102  
Telephone: (702) 258-0022  
9 Facsimile: (702) 258-0114

10 *Attorneys for Defendants*  
11 *Granite State Insurance Company and*  
*National Union Fire Insurance Company of Pittsburgh, PA*

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 FOREMOST SIGNATURE INSURANCE  
COMPANY, a Michigan corporation duly  
15 licensed to sell and administer insurance  
in The State of Nevada,

16 Plaintiff,  
17 v.

18 GMUENDER ENGINEERING, LLC, a  
Nevada limited liability company; JOSEF  
C. GMUENDER and JANE DOE  
19 GMUENDER, husband and wife; MARY E.  
GMUENDER and JOHN DOE MUENDER,  
husband and wife; WILLIAM HUBER,  
parent and guardian of Ashley Huber and  
20 Taylor Huber, individually and as surviving  
children of Kelly Huber, deceased;  
GRANBY REALTY HOLDINGS, LLC, a  
Colorado limited liability company;  
21 GRANITE STATE INSURANCE  
COMPANY, an Illinois corporation;  
NATIONAL UNION FIRE INSURANCE  
22 COMPANY OF PITTSBURGH PA, a  
Pennsylvania corporation,

23  
24 Defendants.  
25  
26  
27  
28

Case No. 3:19-cv-00508-MMD-CBC

**STIPULATION AND [PROPOSED]  
ORDER FOR EXTENSION OF TIME  
TO FILE RESPONSIVE PLEADING TO  
PLAINTIFF'S COMPLAINT**

**(First Request)**

1 Defendants, GRANITE STATE INSURANCE COMPANY ("Granite State") and  
2 NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA ("National  
3 Union"), by and through its attorneys of record, NICOLAIDES FINK THORPE  
4 MICHAELIDES SULLIVAN LLP, and Plaintiff, FOREMOST SIGNATURE INSURANCE  
5 COMPANY ("Plaintiff"), by and through its counsel of record, CHRISTIAN, KRAVITZ,  
6 DICHTER, JOHNSON & SLUGA, LLC, hereby stipulate and agree to extend the  
7 deadline for Granite State and National Union to file a Responsive Pleading to  
8 Plaintiff's Complaint up to and including December 20, 2019.

9 This stipulation is submitted in compliance with LR IA 6-1. Good cause exists for  
10 the requested extension as this insurance coverage lawsuit arises from an underlying  
11 accident that took place in December 2016 and involves underlying litigation in both  
12 Colorado State and Federal courts. The Parties to this stipulation agree that additional  
13 time is needed to fully evaluate the insurance coverage issues in this matter.

14 This is the parties' first request for an extension of the deadline.

15 Dated: November 8, 2019

NICOLAIDES FINK THORPE  
MICHAELIDES SULLIVAN LLP

17 By: /s/ Jeffrey N. Labovitch  
18 Jeffrey N. Labovitch  
Nevada Bar No. 10915  
19 4365 Executive Drive, Suite 950  
San Diego, CA 92121  
20 *Attorney for Defendants Granite State  
Insurance Company and National Union  
Fire Insurance Company of Pittsburgh, PA*

22 Dated: November 8, 2019

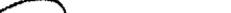
CHRISTIAN, KRAVITZ, DICHTER,  
JOHNSON & SLUGA, LLC

24 By: /s/ Gena L. Sluga  
25 Gena L. Sluga  
Nevada Bar No. 9910  
26 8985 South Eastern Avenue, Suite 200  
Las Vegas, NV 89123  
27 *Attorney for Plaintiff Foremost Signature  
Insurance Company*

## **ORDER**

**GOOD CAUSE SHOWN, IT IS SO ORDERED.**

Dated this 18th day of November, 2019.

  
\_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE